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Secretary Ken Salazar
Department of the Interior
1849 C Street, N.W.
Washington DC 20240

Feb. 21, 2012

Dear Secretary Salazar,

Greenpeace is the world's largest independent environmental organization. For over 40 years, we have been winning campaigns to protect the environment. We do not take any money from corporations, industry or government.

Last week, internal documents from the Heartland Institute, a purported independent nonprofit, became public showing that the Institute has been receiving large donations from corporations to create misinformation about climate change. According to *The New York Times*, these documents show that Heartland "is planning a new push to undermine the teaching of global warming in public schools."¹

Mark S. McCaffrey, programs and policy director for the National Center for Science Education, told *The New York Times* that the internal Heartland documents show that when it comes to climate change, "they continue to promote confusion, doubt and debate where there really is none."²

In one document titled "Heartland Institute 2012 Proposed Budget," Heartland discussed plans for a multi-year budget for its Nongovernmental International Panel on Climate Change (NIPCC), which is described as "an international group of scientists that produces critiques of the reports of the United Nation's IPCC" [Intergovernmental Panel on Climate Change].³ According to the document, climate contrarian Craig Idso had recruited several scientists to be contributors and authors to NIPCC reports that attempted to undermine the conclusions of the IPCC.

In the table that discusses the personnel budget for the NIPCC, there are several items that list monthly payments for authors who are drafting different chapters of a report. One line item lists Department of Interior (DOI) employee Indury Goklany as receiving monthly payments of

¹ Justin Gillis and Leslie Kaufman, "Leak Offers Glimpse of Campaign Against Climate Science," *The New York Times*, February 12, 2012.

²*Ibid.*

³ Heartland Institute 2012 Proposed Budget, p. 7, available at:
<http://www.desmogblog.com/sites/beta.desmogblog.com/files/%281-15-2012%29%202012%20Heartland%20Budget%20%282%29.pdf>

\$1,000 to write Chapter 2.5 on Economics and Policy. The document notes his affiliation with the Department of Interior.⁴

According to DOI's website, Indur Goklany is a "Senior Advisor" in the Office of Policy Analysis.⁵

We are disturbed that a DOI employee is apparently accepting payments from an organization that is actively attempting to influence government policies on climate change. On its website, the Heartland Institute states that its mission is "to promote free market solutions."⁶ One way the group accomplishes these goals is through its publications. According to Heartland:

Heartland sends six monthly public policy newspapers addressing the major domestic public policy issues to every national and state elected official in the U.S. plus 8,400 county and local officials and thousands of civic and business leaders. It also produces books, policy studies, and booklets.⁷

Another strategy for Heartland is its government relations program. According to the group's website:

Our government relations staff made more than one million contacts with elected officials in 2010, 14,715 of those contacts were one-on-one either in person, by phone, or by one-to-one emails.⁸

We find it alarming that a federal employee at DOI may be taking money from the Heartland Institute. Federal regulations guard against such attempts at influence. For instance, in 2006 Hale Hawbecker with the DOI Ethics Office released a power point titled "Doing Things Right: Ethical Considerations in Government Service."⁹

In the presentation, Mr. Hawbecker discussed criminal conduct and the acceptance of outside employment by federal employees, as well regulations governing gifts from outside sources. Slide number 24 details "prohibited sources" from which a government official cannot accept gifts. On slide number 25, he listed "more prohibited sources" from which federal employees may not accept gifts. Among the prohibited sources, Mr. Hawbeck lists "an outside organization that seeks to influence the government."¹⁰

⁴ Heartland Institute 2012 Proposed Budget, p. 8, available at:
<http://www.desmogblog.com/sites/beta.desmogblog.com/files/%281-15-2012%29%202012%20Heartland%20Budget%20%282%29.pdf>

⁵ See Department of Interior webpage <http://www.doi.gov/ppa/Office-of-Policy-Analysis-Staff-Directory.cfm>.

⁶ See Heartland website: <http://heartland.org/about>.

⁷*Ibid.*

⁸*Ibid.*

⁹ See webpage: <http://tinyurl.com/6o57wf3>.

¹⁰*Ibid.*

On slide 37, Mr. Hawbeck addressed prohibited outside activities, which are regulated under 5 C.F.R. 2635.801-809. The slide states:

You generally may not receive pay for teaching, speaking and writing that relates to your official duties¹¹

We completely agree that it is unacceptable for outside organizations to give gifts or other compensation to DOI employees. In fact, it is our policy to not provide government scientists with gifts or other compensation to ensure the objectivity of federal research.

CONCLUSION AND QUESTIONS

We are concerned that the DOI apparently allows a federal scientist to receive payments from an outside group attempting to influence federal policy. And according to the DOI's own policies, this appears to be illegal. In order to help us understand this issue better, please respond to the following questions and requests for documents.

1. Please explain the DOI's policies and procedures on federal employees receiving income and/or gifts from outside groups attempting to influence policy.
2. If Indur Goklany received payments and/or gifts from the Heartland Institute, did he violate any policies/procedures of the DOI? If not, please explain why not.
3. If the Heartland Institute provided payment and/or gifts to Indur Goklany, did it violate any policies and/or procedures of the DOI? If not, please explain why not.

We thank you for your time and attention to this matter. If you have any questions, please do not hesitate to contact my Research Director Kert Davies at (202) 319-2455.

Sincerely,



Philip D. Radford
Executive Director
Greenpeace USA

¹¹ *Ibid.*